

EXHIBIT 7

1 THE HONORABLE THOMAS S. ZILLY
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7 UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 ECHOTA C. WOLFCLAN, on behalf of
11 himself and other similarly situated
12 individuals,

13 vs.

14 PIERCE COUNTY, et al.,

Plaintiffs,

Defendants.

15 NO. 23-cv-5399-TSZ-SKV

16 PLAINTIFF ECHOTA WOLCLAN'S FIRST
17 INTERROGATORIES AND REQUESTS
18 FOR PRODUCTION TO DEFENDANTS

19 **AND FOURTH SUPPLEMENTAL
20 ANSWERS THERETO RE: ROG 6, RFP 6
& RFP 17**

21 COME NOW the Defendants by and through their attorneys, Prosecuting Attorney Mary
22 E. Robnett and Deputy Prosecuting Attorney Frank Cornelius to answer Plaintiff Cynthia Fajardo's
23 First Set of Interrogatories and Requests for Production Propounded to Defendant Pierce County.

24 **PRELIMINARY STATEMENT**

It should be noted that these responding parties have not completed their investigation of
facts related to this case or their discovery and have not completed their preparation for trial. All
of the answers contained herein are based only upon such information and documents that are
presently available to and specifically known to these responding parties.

It is anticipated that further discovery, independent investigation, legal research, and

1 analysis will supply additional facts, add meaning to the known facts, as well as establish entirely
2 new factual conclusions, all of which may lead to substantial additions to, changes in, and
3 variations from the contentions herein set forth.

4 Therefore, the following interrogatory responses are given without prejudice to the
5 responding parties' right to produce evidence of any subsequently discovered fact or facts which
6 they may later obtain. The responding parties accordingly reserve the right to change any and all
7 answers herein when additional facts are ascertained, analyses are made, legal research is
8 completed, and contentions are made. The answers contained herein are made in a good faith
9 effort to supply as much factual information and as much specification of legal contentions as is
10 presently known but should in no way be to the prejudice of these responding parties in relation to
11 further discovery, research, or analysis.

12 **GENERAL OBJECTIONS**

13 Defendants object generally to Plaintiff's prefatory instructions and definitions, to the
14 extent they purport to require more than the civil rules for discovery. Defendants neither agree
15 nor stipulates to the preceding definitions and procedures. All answers are provided pursuant to
16 FRCP 26(b). Defendants assert the following additional general objections:

17 1. **Limitations on Discovery**. This case is currently a single action. Plaintiff Wolfclan
18 seeks to certify a class defined as:

19 All detainees held in the Pierce County Jail, Cell Block 3 North A from April 8, 2023,
20 until the present, and any other cell blocks having unremedied plumbing defects leading
21 to the same, similar, or worse living conditions, and all detainees who will be held in
those cells blocks in the future ("the Plaintiff Class").

22 Plaintiff's class definition is overly broad and vague. Class certification has not been
23 decided by the Court.

1 2. **Relevance and Scope.** Defendants object to Plaintiff's First Set of Interrogatories and
 2 Requests for Production because, as written, they are overly broad, vague, and unduly burdensome,
 3 many are duplicative and/or seek duplicative information, seek information or documentation not
 4 relevant to the subject matter of this action, and are not reasonably calculated to lead to the
 5 discovery of admissible evidence.

6 3. **Proportionality.** Defendants object to Plaintiff's First Set of Interrogatories and
 7 Requests for Production as overly broad and unduly burdensome because, as written, they would
 8 require extensive, unreasonable, expensive, and labor-intensive investigation that is out of
 9 proportion to, and cannot be justified in light of, Plaintiff's claims. See Fed. R. Civ. P. 26(b)(2)(C).

10 4. **Undue Complexity and/or Additional Obligations.** Defendants object to Plaintiff's
 11 First Set of Interrogatories and Requests for Production to the extent they seek to impose discovery
 12 obligations above and beyond those imposed by the Federal Rules of Civil Procedure and the Local
 13 Rules.

14 5. **Privilege and Disclosure Limitations.** Defendants object to Plaintiff's First Set of
 15 Interrogatories and Requests for Production to the extent they seek information protected from
 16 disclosure by privileges and other protections from production including, without limitation, the
 17 attorney-client privilege, the work-product doctrine, or any other constitutional, statutory, common
 18 law or regulatory protection, limitation, immunity or proscription from disclosure. Defendants do
 19 not intend the inadvertent disclosure of any privileged or private and protected information to
 20 constitute waiver of Defendants' rights to assert any applicable privilege or protection with respect
 21 to any such information or any other matter.

22 6. **Supplementation.** It should be noted that Defendants have not completed their
 23 investigation of facts related to this case or its discovery and have not completed their preparation
 24 for trial. In addition, class certification has not been determined. It is anticipated that further

1 discovery, independent investigation, legal research, and analysis will supply additional facts, add
2 meaning to the known facts, as well as establish entirely new factual conclusions, all of which may
3 lead to substantial additions to, changes in, and variations from the answers herein set forth.

4 Therefore, Defendants do not waive any right to produce evidence of any subsequently
5 discovered fact or facts which it may later obtain. Defendants accordingly reserve the right to make
6 additional objections and supplement answers to discovery requests when facts and/or additional
7 facts are ascertained, analyses are made, legal research is completed, and contentions are made.

8 **INTERROGATORIES**

9 **INTERROGATORY NO. 1:** Describe each individual Defendant's work history from
10 2012 to Present, including, but not limited to each employer, job title, business address, immediate
11 supervisor, dates of employment, compensation, and reason(s) for leaving.

12 **ANSWER:**

13 Objection overly broad, beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to
14 discovery of admissible evidence. In particular, employment and personnel file information is not
15 relevant to the subject litigation, including but not limited to compensation. This request is invasive
16 of the individual Defendants' right to privacy and raises concerns regarding safety of individual
17 Defendants because they are correctional deputies and/or employees of the Pierce County Sheriff
18 Department. Objection to the extent that the discovery request seeks information related to
19 employment outside of Pierce County and such information would not be in the care, custody or
20 control of the Defendants. Further objection, outside the scope of class certification question.
21 Without waiving objections, and limiting answer to the time period of April 8, 2020, to the date of
22 the initial Complaint May 2, 2023, please contact defense counsel to discuss answer subject to
23 protective order.

1 SUPPLEMENTAL ANSWER 08/09/2024:

2 Patti Jackson: Job Title: Pierce County Patrol Bureau Chief Patti Jackson; Address: c/o
3 Frank Cornelius Pierce County Deputy Prosecuting Attorney; Supervisor: Ed Troyer; currently
4 employed and employed during the above time period as Chief of Corrections; compensation
5 \$215,940.27 (annual salary).

6 Ed Troyer: Job Title: Pierce County elected Sheriff – employed during the above time
7 period; Address: c/o Frank Cornelius Pierce County Deputy Prosecuting Attorney; currently
8 employed and employed during the above time period as the Sheriff's Department public
9 information officer; compensation \$191,099.85 (annual salary).

10 Captain Matthew Dobson: Job Title: Captain Corrections; Address: c/o Frank Cornelius
11 Pierce County Deputy Prosecuting Attorney; Supervisor: Kevin Roberts; currently employed and
12 employed during the above time period; compensation \$178,120.38 (annual salary).

13 Sergeant Anthony Mastandrea: Job Title: Sergeant Corrections—employed during the
14 above time period; Address: c/o Frank Cornelius Pierce County Deputy Prosecuting Attorney;
15 Supervisor: Stacie Woodley; not currently employed at Pierce County – separation date 6/28/2024;
16 salary \$60.02 per hour.

17 **INTERROGATORY NO. 2:** Identify all individuals who have been employed or
18 contracted to perform maintenance of toilets or plumbing at Pierce County Jail since 2012,
19 including whether the individual is directly employed by Pierce County or is a contractor. For
20 contracted individuals, identify the name and address of his/her employer. For each individual
21 listed, whether employee or contractor, include the full name and dates he/she worked at Pierce
22 County Jail.

23 ANSWER:

1 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
 2 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
 3 seeks information that would not be relevant to the claims and defenses in this litigation. The
 4 discovery request is vague as to “maintenance of toilets or plumbing.” Further objection, outside
 5 the scope of class certification question, and the request is disproportionate to the needs of this
 6 case. Without waiving objections and limiting answer to Jail location 3NA and the time period of
 7 April 8, 2020 to the date of the initial Complaint May 2, 2023: In order to identify potential
 8 responsive information, the discovery request implicates ESI protocol. Supplement pending ESI
 9 protocol finalization.

10 SUPPLEMENTAL ANSWER 08/15/2024: Pierce County maintenance employees are
 11 as follows: Scott Krupa, Robert Soule, Jaysen Render, Tony Bernal, Ricardo Vazquez, Scott
 12 Jones, Thay Phok. Identification of outside contractors requires a Facilities Mgt. ESI
 13 search. Targeted search terms are necessary. As of the date of this supplement, Plaintiff has not
 14 provided search terms.

15 **INTERROGATORY NO. 3:** Identify all individuals who have been employed or
 16 contracted to perform maintenance of grievance kiosk systems at Pierce County Jail since 2012,
 17 including whether the individual is directly employed by Pierce County or is a contractor. For
 18 contracted individuals, identify the name and address of his/her employer. For each individual
 19 listed, whether employee or contractor, include the full name and dates he/she worked at Pierce
 20 County Jail.

21 ANSWER:

22 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
 23 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
 24 seeks information that would not be relevant to the claims and defenses in this litigation. The

1 discovery request is vague as to “maintenance of grievance kiosks systems.” Further objection,
2 outside the scope of class certification question, and the request is disproportionate to the needs of
3 this case. Without waiving objections and limiting answer to Jail location 3NA and the time period
4 of April 8, 2020 to the date of the initial Complaint May 2, 2023: This discovery request to be
5 supplemented.

6 8/24 SUPPLEMENTAL ANSWER:

7 Katie Flores
Aramark
8 6311 Inducon Corporate Dr., Ste. #6
Sanborn , NY 14132

9 Do not have dates of employment.

10 **INTERROGATORY NO. 4:** Describe the policy and/or procedure that Pierce County
11 Jail has in place to address when a correctional officer or any other employee receives a complaint
12 from an inmate regarding sanitation conditions in a cell, including but not limited to complaints
13 about plumbing, toilets, sewage, and/or unsanitary living conditions. Include any change(s) in
14 policy that has occurred, including but not limited to during and in response to the COVID-19
15 pandemic.

16 ANSWER:

17 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
18 to discovery of admissible evidence. Objection vague as to “complaint,” “sanitation conditions,”
19 “complaints about plumbing, toilets, sewage, and/or unsanitary conditions.” The discovery request
20 is duplicative and/or seeks duplicative materials as Requests for Production 15. The request is
21 disproportionate to the needs in this case and seeks information that would not be relevant to the
22 claims and defenses in this litigation. Further objection, outside the scope of class certification
23 question, and the request is disproportionate to the needs of this case. Without waiving objections,

the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: See Request for Production No. 4.

INTERROGATORY NO. 5: Identify each documented instance that an inmate, including but not limited to Plaintiff, has complained about unsanitary living conditions, including complaints about plumbing, sewage, and/or the toilets at Pierce County Jail, whether by formal grievance or otherwise, at any point since 2012 to Present.

ANSWER:

The discovery request implicates RCW 70.28.100 and privacy protection. Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in this case and seeks information that would not be relevant to the claims and defenses in this litigation. Objection to the extent that the discovery request seeks attorney-client and/or work product. Objection vague as to “complained about unsanitary living conditions,” “complaints about plumbing, sewage, and/or toilets.” The discovery request is duplicative and/or seeks duplicative materials as Requests for Production 15, 16, 18. Without waving objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.

INTERROGATORY NO. 6: Identify each employee who has worked in any capacity with inmates housed in the Mental Health Unit(s), including Unit 3 North A, of the Pierce County Jail, including but not limited to Correctional Officers and/or guards, psychiatrists, and other Mental Health staff (e.g. "MHP"), since 2012 to Present. For each, include the individual's full name, job title, duties and responsibilities, immediate supervisor, and dates of employment.

ANSWER:

1 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
 2 to discovery of admissible evidence. Objection vague as to “any” capacity. The request is
 3 disproportionate to the needs in this case and seeks information that would not be relevant to the
 4 claims and defenses in this litigation. Objection to the extent that the discovery request seeks
 5 information related to employment outside of Pierce County, including but not limited to
 6 NaphCare workers, and such information would not be in the care, custody or control of the
 7 Defendants. Further objection, outside the scope of class certification question, and the request is
 8 disproportionate to the needs of this case. Without waiving objections, and limiting answer to
 9 name and title, Jail location 3NA and the time period of April 8, 2020 to the date of the initial
 10 Complaint May 2, 2023:

11 8/2/24 SUPPLEMENTAL ANSWER:

12 Correctional Staff:

13 Yelle, Rachel Annette
 14 Friermuth, Kenneth Dale
 15 Tunnell, Grady Wayne
 16 Erwin, Christopher Peter
 17 Carn, Donald Lee
 18 Guiler , Yolanda Juanita
 19 Tveit, Wendy A
 20 Pearson, Torvald A
 21 Berry, Stephen Robert
 22 Jenkins, Daniel Lee
 23 Clawson, Russell O
 24 Crews, Josef Michael
 25 Brown, Timothy Ray
 26 Bautista, Alvin Balansay
 27 Macoy, Kelly S
 28 Rethaford, Jay Andrew
 29 Hersey, Dayna Louise
 30 Marler, Boyd Aaron
 31 Wells, Kurtis Anthony
 32 Chung, David Gentaro
 33 Sturtz, Eric Linn
 34 Defilippis, Larry
 35 Burdick, Scott Leroy

1 Raschko, Ryan Michael
2 Swick, James Leslie
3 Thompson, Erika Leigh
4 Sandoval, Peter Paul
5 Brandt, Kari Kay
6 Warren, Howard James
7 Larsen, Jennifer Lynn
8 Lyon, Teresa Lynn
9 Wilson, Peter Alvin
10 Cooley, Christopher Lee
11 Collins, Crystal Lynn
12 Watson, Matthew Warren
13 Stuckert, Thomas Edward
14 Langford, Jesse Lee
15 Stone, Laura Lea
16 Hamilton, Laura Lea
17 Jones, Paul Robert
18 Ferrell, Anthony Craig
19 Newkirk, Jonathan David
20 Chojnowski, Christopher T
21 Mock, Dawn Delynn
22 Starks, Stanley R
23 Ramos, Tonya Jo
24 Dixon, Deneen Angelica
13 Cherry, Steven Antonio
14 Fields, Walton Christopher
15 Wales, Kent Dominic
16 Starks, William David
17 Oeltjen, Julie Anne
18 Quiero, Melvyn Francisco
19 Vadala, Donavan Joseph
20 Rankin, Lynette Patrice
21 Jackson, Troy Anthony
22 Hernandez, Hector Rafael
23 Vicente, Janis
24 Bundy, Chandra Lynn
19 Morton, Deborah
Herbison, Kristi Lyn
20 Thompson, Benjamin Allen
21 Clostio, Troy Clint
22 VanWinkle, Russell Dell
Miller, Robert Edward
23 Hopkins, Deborah Lynn
Desilet, Colleen Laura
Perry, Scott
Nishi, Heidemarie
24 Cavelti, Aaron Anthony

PLAINTIFF ECHOTA WOLFCLAN'S FIRST INTERROGATORIES AND REQUESTS
FOR PRODUCTION TO DEFENDANT AND FOURTH SUPPLEMENTAL

ANSWERS THERETO - 10

EX 7 P_s 1st Set of Rogs and RFPs to PC and 4th Supplemental Answers Thereto.docx
USDC WAWD No.

Pierce County Prosecuting Attorney/Civil Division
930 Tacoma Avenue South, Suite 946

Tacoma, Washington 98402-2102

Main: (253) 798-6732 / Fax: (253) 798-6713

1 Belmudes, Stacy Dale
2 Temple, Ronald Craig
3 Zambrana, Neftaly
4 Correll, Edward Luther
5 Lynam, Dana Robert
6 Hicks, Andy Jackson
7 Lampman, Michael Shawn
8 Anton, Patricia Elise
9 White, Laurentine Lynn
10 Devyak, Mark Douglas
11 Lyon, John David
12 Sawyer, Bryce Sly
13 Wade, Brad Jerome
14 Hamilton, Eric Glen
15 Scott, Craig Allan
16 Theodorson, John Bernard
17 Graham, David Neil
18 Stanley, Philip Robert
19 Skevington, Richard Dale
20 Petersen, Michael James
21 Benson, Byron Christopher
22 Thomsen, Benjaman Ejgil
23 Torres, Peter B
24 Lee, Nicholas David
13 Gannon, Shirley Marie
14 Russell, William Charles
15 Buchanan, Steven Phillip
16 Oeltjen, Rickie Lee
17 Peek, Michael Wayne
18 Rankin, Tim Wayne
19 Schooley, Michael John
20 Azcueta, Raul Ricky-Morales
21 Cruz, William Ramon
22 Prince, Terry Gene
23 Cherry, Sandra Marie
24 Blind, Jonathan Henry
19 Boyle, Jesse Alan
20 Kavanaugh, Eric Paul
21 McLane, Joshua Patrick
22 Berwick, David Alan
23 Maldonado, Edwin
24 Davis, Glen William
22 Davis, Roger Lamont
23 Severson, Rocklin Jock
24 Brink, Robert Joseph
Place, Jessica Leigh
McWilliams, Carleen Loree

1 Buckingham, Bryan Richard
2 Allen, Ruth Ann Marie
3 Harris, Jarvis Levin
4 Brown, Donald Garrett
5 Schiedeck, Kevin Allen
6 Earp-Peek, Elizabeth Wyatt
7 Desmond, Robert Calvin
8 Shanahan, Lisa Lynn
9 Shaw, Jeremy Damon
10 Haley, Jason Jerrodd
11 Stimer, John William
12 Blowers, James Mileum
13 Mareko, Faafetai Navy
14 O'Neill, Alan Leighton
15 Whitehead, Matthew
16 White, Anthony Arnett
17 Wagoner, Michael Henry
18 Gardner, Craig Hamilton
19 Hollis, Matlean Melva
20 Ashley, Cameron Louis
21 Valdez, Luz Maria
22 Hall, Christopher James
23 Graham, Richard Joseph
24 Volk, Keith J
25 Tenney, Heidi Samantha
26 Byrer, Phillip
27 Stephens, Heidi Samantha
28 Graham, Antonio Duane
29 Williams, Alec G
30 Reyes-Blind, Yolanda
31 Hansen, John Oscar
32 Conaway, Sean Patrick
33 Olson, Cody Matthew
34 Crist, Christopher Jay
35 Golden, Precola Angelica
36 Score, Aaron Anthony
37 Thomas, Precola Angelica
38 Adams, John Douglas
39 Jackson, Jerome Marco
40 Papp, Ferenc Gabor
41 Frizzell, Joshua Dan
42 Paul, David William
43 Griswold, Mariana L.
44 Dooley, Jared Duncan
45 Justiniano, Maria Mignon
46 Mulrine, Maria Mignon
47 Neils, Erik Gene

1 Wilkins, Nathan
2 Cruz, Jordan
3 Sidibe, Nouhoum
4 Miller, Davon
5 Lincoln, Kendal
6 Ortiz-Rosado, Carlos
7 Moreno, Mario
8 Paukert, Jacob
9 Peters, Joseph
10 Miller, Roger
11 Klein, Mark
12 Forrey, Robin
13 Langowski, Adam
14 Cropp, Jeffrey
15 Kim, Byong
16 Delgado, Steven
17 Papp, Morgan
18 Fountain, Morgan
19 Knight, Jonathon
20 Morse, Daniel
21 Borrero, Flor
22 Rogers, Colton
23 Duffy, Jeremie
24 Lunau, Brenda
Sollars, Matthew
Tirado-Mendez, Juan
Velleeses, Kimo
Bortle, Leanna
Castro, Lisandro
Bonney, Steven
Lin, Lin
Trussell, Douglas
Rankin, Ray
Spieth, Jorden
Hayes, Travis
Spanier, Austin
Rosenthal, Andrew
Bradley, Jonah
Strunk, Aurora
Berry, David
Johnson, Nicholas
Maulin, Zachary
Garlock, Cameron
Davis, Richard
Than, Sophal
Perry, Garrett
Nellenbach, Thomas

1 Sapp, Dillion
2 Clark, Trevor
3 Barrett, Joseph
4 Lincoln, Charles
5 Pham, Phi
6 Owen, Steven
7 Tucker, Amber
8 Yi, Ki
9 Haynes, Drajuan
10 Hayes, Donerick
11 Laliberte, Kailee
12 Smith, Jason
13 Winfree, Ryan
14 Fowler, Andrew
15 Falzone, Gianni
16 Utii, Aleki
17 Herr, Trey
18 Hoffman, Tonia
19 Cridge, Jamie
20 Fien, Anthony
21 Mantenga, Rebekka
22 Harper, Jonathan
23 Music, Austin
24 Cote, Nathan
1 Aguilar, Truman
2 Boudinot, Truman
3 Craugh, Casey
4 Conn, Dakota
5 Frye, Randolph
6 Willis, Kimberly
7 Torres, Iris
8 Boggan, James
9 Aroche, Andres
10 Scott, Audria
11 Oleson-Borland, Tatanie
12 Peck, Denise
13 Chester-Branham, Hope
14 Kim, Jungeun (Angela)
15 Jones, Garrett
16 Tomas Gaspar, Alexander
17 McBride, Sagrario
18 Ramos, Mark A. Jr
19 Preslar, Merle E.
20 Sanders, Dylan L.
21 Sainati, Angela A.
22 Williams, Sean L.
23 Raplee, Justin Dakota

1 Smith, Rachel Nicole
2 Hamilton, Jeff Craig
2 Scott, Jasmine Tatiyana
3 Avega, Shanlynn Fetu Lokahi
3 Crockett, Christopher Walter
4 Buabeng, Eugene Anyan
4 Hassan, Ahmed Mohamed
5 Salman, Jan J.
5 Fermin-Henry, Patricia
6 Abel, Dylan John
6 Barrett, James Andrew
7 Watson, Orrett Henry
7 Ferguson, Michelle D.
8 Piland, Joshua
8 Braswell, Timothy Sabrina
9 Johnson, Douglas K.
9 Stenzel, Gail A.
9 Sadlier, Philip S.
10 Wasson, George W.
10 Herbison, Darryl S.
11 Smith, Preston L.
11 Alexander, Dione
12 Schultz, David D.
12 Mastandrea, Anthony Michael
13 Caruso, Jackie Anne
13 Ake, Forest Scott
14 Woodley, Stacie Lynn
14 Graham, Michele
15 Watkins, Douglas Lee
15 Pihl, Tamara Kay
16 Ristine, Andrew Lewis
16 Duray, Jerome Justin
17 Lee, Il-Sop
17 Conuel, Brian Edward
18 Blowers, Brian Albert
18 Allen, Alvin Russell
19 Wade, Adam Cedric
19 Aaron, Bryan
20 Finley, Jason Matthew
20 Stanley, Philip Robert
21 Lynam, Dana Robert
21 Miller, Robert Edward
22 Blind, Jonathan
22 Shanahan, Lisa
23 Davis, Glen William
23 Russell, William Charles
24 Lincoln, Kendal

1 Buchanan, Steven Phillip

2 Medical Staff:

3 Isoken Ogiesora LPN

4 Mariena Mears NP

5 Veronica Slaughter Pharmacist

6 Lynette Hunt Medical Records Clerk

7 Maria Rader LPN

8 Azusa Matsubayashi Psych NP

9 Melanie Contreras LPN

10 Rochelle Hill LPN

11 Nicholas Moses LPN

12 Genevieve Herbrand LPN

13 Natalie Langel RN

14 Victoria Straus RN

15 Sarah Harbor LPN

16 Cameron Carrillo LPN

17 Ashley Valencia Chalk RN

18 Jesus Paez LPN

19 Robert Wargacki RN

20 Elyssa Manford LPN

21 Jazmine Marion LPN

22 Ruth Muuru MHP

23 Megan Hamel MHP

24 Ilene Anderson MHP

Kathryn Riley LPN

Constance Burden LPN

Revekka Pronina LPN

Duane Collins RN

Alisha Hughes RN

Alexander Jones RN

Lindzie Boyd RN

Angela Williams-Purdy LPN

Gwynne Crandall Mental Health Office

Administrator

Jonathon Slothower HSA

Angela Valencia DON

Jesus Perez MHP

Maria Surla LPN

Jennifer Hagara LPN

Rose Rains Charge Nurse RN

Marlita Tresch Pharmacy Tech

Jason Wiggins RN

Katy Mcfarlin RN

1 Miguel Balderrama Medical Director

2 **CORRECTION AND SUPPLEMENTAL ANSWER 8/22/2024:**

3 **Medical Staff:**

4 **Pierce County Employees:**

5 **Ilene Anderson – MHP; supervisor Karen Bier**

6 **Ruth Muuru – MHP; supervisor Karen Bier**

7 **Megan Hamel – MHP; supervisor Karen Bier**

8 **Gwynne Crandall – Office Admin.; supervisor Karen Bier**

9 **Angela Valencia – Director of Nursing**

10 **Miguel Balderrama - Medical Director**

11 See also Request for Production No. 6 supplemental Job Classification materials for job

12 duties and responsibilities. See Request for Production No. 6 Excel spreadsheets previously

13 supplemented for correctional staff job titles, immediate supervisor, and dates of

14 employment in the 3NA section of the jail from April 8, 2020 to May 2, 2023.

15 **Naphcare Contract Employees:**

16 **Isoken Ogiesora LPN**

17 **Mariena Mears NP**

18 **Veronica Slaughter Pharmacist**

19 **Lynette Hunt Medical Records Clerk**

20 **Maria Rader LPN**

21 **Azusa Matsubayashi Psych NP**

22 **Melanie Contreras LPN**

23 **Rochelle Hill LPN**

24 **Nicholas Moses LPN**

25 **Genevieve Herbrand LPN**

26 **Natalie Langel RN**

27 **Victoria Straus RN**

28 **Sarah Harbor LPN**

29 **Cameron Carrillo LPN**

30 **Ashley Valencia Chalk RN**

31 **Jesus Paez LPN**

32 **Robert Wargacki RN**

33 **Elyssa Manford LPN**

34 **Jazmine Marion LPN**

1 **Kathryn Riley LPN**
2 **Constance Burden LPN**
3 **Revekka Pronina LPN**
4 **Duane Collins RN**
5 **Alisha Hughes RN**
6 **Alexander Jones RN**
7 **Lindzie Boyd RN**
8 **Angela Williams-Purdy LPN**
9 **Jonathon Slothower HSA**
10 **Jesus Perez MHP**
11 **Maria Surla LPN**
12 **Jennifer Hagara LPN**
13 **Rose Rains Charge Nurse RN**
14 **Marlita Tresch Pharmacy Tech**
15 **Jason Wiggins RN**
16 **Katy Mcfarlin RN**

17 **INTERROGATORY NO. 7:** Identify and describe each instance in which any portion of
18 the plumbing at Pierce County Jail has been inspected, repaired, or replaced since 1985 to Present.

19 **ANSWER:**

20 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
21 to discovery of admissible evidence. Objection overly broad as to “any portion of the plumbing”
22 and vague as to “each instance,” “inspected, repaired, or replaced.” The request is disproportionate
23 to the needs in this case and seeks information that would not be relevant to the claims and defenses
24 in this litigation. Objection to the extent that this discovery request is/would be duplicative to
25 Interrogatory No. 9 and Request for Production No. 9, 15, 20, 31. Without waiving objections
26 and limiting answer to Jail location 3NA and the time period of April 8, 2020 to the date of the
27 initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery
28 request implicates ESI protocol. Supplement pending ESI protocol finalization.

29 **INTERROGATORY NO. 8:** Identify how many inmates have been housed in the area
30 that is currently known as Unit 3 North A from 2012 to Present.

31 **ANSWER:**

1 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
2 to discovery of admissible evidence. The discovery request also implicates RCW 70.28.100 and
3 privacy protection. Without waiving objections and limiting answer to Jail location 3NA and the
4 time period of April 8, 2020 to the date of the initial Complaint May 2, 2023: To be supplemented.

5 8/2/24 SUPPLEMENTAL ANSWER:

6 472

7 **INTERROGATORY NO. 9:** Identify and describe any and all studies and/or cost
8 estimates that have been provided to Pierce County and/or Pierce County Jail since 1985 to Present
9 regarding the plumbing and/or toilets at Pierce County Jail. For each, describe the anticipated cost
10 of replacing the toilets and/or plumbing, the decision that was made regarding whether to replace
11 the toilets and/or plumbing, why the decision was made, and who made the decision.

12 ANSWER:

13 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
14 to discovery of admissible evidence. Objection overly broad and vague as to “studies and/or cost
15 estimates,” “plumbing and/or toilets” and timeframe. Objection to the extent that this discovery
16 request is/would be duplicative to Interrogatory No. 7. The request is disproportionate to the needs
17 in this case and seeks information that would not be relevant to the claims and defenses in this
18 litigation. Without waiving objections and limiting answer to Jail location 3NA and the time
19 period of April 8, 2020 to the date of the initial Complaint May 2, 2023: In order to identify
20 potential responsive information, the discovery request implicates ESI protocol. Supplement
21 pending ESI protocol finalization. See also Defendants’ Initial Disclosures Bates No. 400412-
22 400424.

23 **INTERROGATORY NO. 10:** Identify and describe all policies regarding the cleaning
24 of cells in Pierce County Jail, including the process by which an inmate can request and receive

1 cleaning supplies for his or her cell, the hours the supplies are available, whether supervision is
2 required while an inmate uses the supplies, when and for what reason cleaning supplies may be
3 denied, and whether the process for obtaining and/or the availability of cleaning supplies differs
4 between various units in the Jail, and if so, describe the differences and reasons for those
5 differences.

6 ANSWER:

7 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
8 to discovery of admissible evidence. Objection overly broad and vague as to “cleaning of cells.”
9 Without waiving objections: See Request for Production No. 10.

10 **INTERROGATORY NO. 11:** Identify and describe each instance that an inmate,
11 including but not limited to Plaintiff, was denied the ability to submit a grievance about unsanitary
12 living conditions at Pierce County Jail from 2012 to Present. For each instance, describe the reason
13 for the denial and what, if any, alternative option for filing a grievance was provided to the inmate.

14 ANSWER:

15 Objection assumes facts not in evidence. Objection overly broad and beyond the scope of
16 Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. Objection vague
17 regarding “unsanitary living conditions.” The discovery request also implicates RCW 70.28.100
18 and privacy protection. Objection to the extent this discovery request seeks an admission. Further
19 objection, outside the scope of class certification question, and the request is disproportionate to
20 the needs of this case. Without waiving objection and limiting answer to Plaintiff Wolfclan,
21 Plaintiff Wolfclan was not denied the ability to submit a grievance.

22 **INTERROGATORY NO. 12:** Identify the factual basis for Defendants’ denial of
23 Paragraph 60 to Plaintiff’s Amended Complaint (Dkt. 107), filed May 10, 2024, and Defendant’s
24 contention that “Plaintiff misrepresents a 2014[] engineering report regarding water closet

1 placement,” as stated in Defendant’s proposed Joint Status Report and Discovery Plan.

2 ANSWER:

3 Objection to the extent that the discovery request seeks attorney-client and/or work
4 product. Objection, relevance. Without waiving objection, the cited report speaks for itself.

5 **INTERROGATORY NO. 13:** Identify the factual basis for each of Defendants’ pleaded
6 affirmative defenses, as stated on pages 13 through 14 of their Answer (Dkt. 107), filed May 10,
7 2024.

8 ANSWER:

9 Plaintiff’s discovery request represents distinct and separate subjects. Fed. R. Civ. P.
10 33(a)(1) (“a party may serve on any other party no more than 25 written interrogatories, including
11 all discrete subparts.”). Defendants assert 15 affirmative defenses and answers regarding the
12 factual basis for each affirmative defense require 15 distinct answers. See *Brutscher v. GEICO*
13 *General Ins. Co.*, 2015 WL 11921416, at *2 (Interrogatory No. 14 regarding factual basis for each
14 affirmative defense asserted); See also *Grigsby v. Young Men’s Christian Assoc. of Greater*
15 *Seattle*, 2023 WL 3761945. Defendants object to the extent that Plaintiff’s discovery request
16 exceeds the number of interrogatories allowed under Rule 33. In addition, to the extent that an
17 affirmative defense relates to class action, answer and/or additional answer need not be made until
18 the Court decides the class certification issue. Fed. R. Civ. P. 33(a)(2); see *Wilcox v. Swapp*, 2018
19 WL 8244005, at *4. Further objection based on attorney-client and/or work product privileges.
20 Without waiving objections, Defendants state:

21 1. FAILURE TO EXHAUST ADMINISTRATIVE REMEDIES: The Plaintiff has failed
22 to exhaust administrative remedies and the action will not lie. Plaintiff did not file a
23 grievance regarding the allegations in this lawsuit.

24 2. FAILURE TO STATE A CLAIM: The Plaintiff has failed to state a claim upon which

1 relief may be granted, including but not limited to individual participation by
 2 defendants in this lawsuit, including but not limited to Sheriff Ed Troyer, Chief Patti
 3 Jackson, Cpt. Matthew Dobson, and Sgt. Anthony Mastandrea, and basis to establish
 4 standing regarding areas of the jail outside of 3NA.

5 3. FRIVOLOUS AND/OR MALICIOUS CLAIM: Printed words including but not
 6 limited to false allegations, history that surrounds filing, and tone of allegations show
 7 maliciousness. The plumbing system in Cell Block 3 North A is built to code and there
 8 are no harmful gases. Plaintiff misrepresents a 2014, engineering report regarding water
 9 closet replacement. Plaintiff has encouraged other inmates to duplicate or imitate his
 10 false claims.

11 4. NO NOTICE OF DEFECT: Defendant Pierce County had no reasonable notice of the
 12 defect alleged herein. Plumbing in 3NA is built to code.

13 5. NO CLAIM FILING AS REQUIRED BY RCW 4.96.020: Withdrawn.

14 6. NO PERSONAL FAULT: No violation(s) of constitutional rights by personal actions
 15 of individual defendants. Plaintiff fails to plead individual fault by named defendants.

16 7. QUALIFIED IMMUNITY: Defendants are entitled to qualified immunity as to both
 17 state and federal claims. Defense speaks for itself.

18 8. REASONABLE CARE: Defendants' actions were reasonable, and they did not act with
 19 deliberate indifference. Defense speaks for itself.

20 9. DISCRETIONARY IMMUNITY: Defendant(s) state that all actions of Defendants
 21 alleged as negligence, manifests a reasonable exercise of judgment and discretion by
 22 authorized public officials made in the exercise of governmental authority entrusted to
 23 them and are neither tortious nor actionable. Defense speaks for itself.

24 10. GOOD FAITH: Defendants at all times acted in good faith in the performance of their

1 duties and is therefore immune from suit for the matters charged in Plaintiff's
2 Complaint. Defense speaks for itself.

3 11. NEGLIGENCE/INTENTIONAL ACT OF THIRD PARTY OR PARTIES:

4 Defendants state that any alleged damages and/or injuries, if any, claimed by the
5 Plaintiff were proximately caused or contributed to by the negligence and/or intentional
6 conduct of another/others, including but not limited to other inmates who clog their cell
7 toilet/plumbing, and not from any act or omission by Defendants.

8 12. COMPARATIVE FAULT: Plaintiff's alleged injuries and damages, if any, were

9 proximately caused or contributed to by the fault of Plaintiff, including but not limited
10 to clogging his cell toilet.

11 13. COLLUSION: Plaintiff's claims are based on a conspiracy to deceive. Plaintiff has

12 encouraged other inmates to duplicate or imitate his false claims.

13 14. INTERVENING/SUPERSEDING CAUSE: Defendants state that Plaintiff's claims

14 were caused or made worse by an intervening, supervening and/or superseding event
15 or events, including but not limited to actions by other inmates to damage or interfere
16 with toilets and/or plumbing systems.

17 15. FAILURE TO MITIGATE: Defendants state that if Plaintiff suffered any injury or

18 damages, recovery is barred or mitigated by Plaintiff's failure to mitigate damages,
19 including but not limited to Plaintiff Wolfclan's failure to seek medical treatment
20 (discovery ongoing) and not timely informing and/or notifying Defendants when an
21 alleged backup/overflow incident(s) occurred.

22 **INTERROGATORY NO. 14:** Identify all individuals who have been housed in a cell in

23 Pierce County Jail Cell Block 3 North A from April 4, 2023, to Present. For each, include the
24 individual's full name, inmate number, and dates of incarceration at the Pierce County Jail.

1 ANSWER:

2 Objection this discovery request exceeds the number of written interrogatories allowed
3 under Rule 33. Objection to the extent that this discovery request is duplicative to Interrogatories
4 No. 8. Additional objection based on RCW 70.48.100 and privacy protection.

5 **REQUESTS FOR PRODUCTION**

6 **REQUEST FOR PRODUCTION NO. 1:** Produce all documents and communications
7 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 1.

8 RESPONSE:

9 Objection overly broad, beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to
10 discovery of admissible evidence. In particular, employment and personnel file information is
11 not relevant to the subject litigation, including but not limited to compensation. This request is
12 invasive of the individual Defendant's right to privacy and raises concerns regarding safety of
13 individual Defendants because they are correctional deputies and/or employees of the Pierce
14 County Sheriff Department. Further objection based on attorney-client and/or work product
15 privileges. Please contact defense counsel to discuss limited production subject to protective
16 order.

17 SUPPLEMENTAL RESPONSE 08/09/2024:

18 No Documents. Objection to the extent that this discovery requests seeks the same or
19 similar information to Request for Production No. 6. See Request for Production No. 6.

20 **REQUEST FOR PRODUCTION NO. 2:** Produce all documents and communications
21 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 2.

22 RESPONSE:

23 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
24 to discovery of admissible evidence. The request is disproportionate to the needs in this case and

1 seeks information that would not be relevant to the claims and defenses in this litigation. The
 2 Interrogatory No. 2 is vague as to “maintenance of toilets or plumbing.” Further objection, outside
 3 the scope of class certification question, and the request is disproportionate to the needs of this
 4 case. Further objection, outside the scope of class certification question, and the request is
 5 disproportionate to the needs of this case. Without waiving objections and limiting answer to Jail
 6 location 3NA and the time period of April 8, 2020 to the date of the initial Complaint May 2, 2023:
 7 In order to identify potential responsive information, the discovery request implicates ESI
 8 protocol. Supplement pending ESI protocol finalization.

9 SUPPLEMENTAL RESPONSE 08/15/2024: Without waiving prior objections,
 10 including but not limited to timeframe, Facilities Mgt. Work Order Summary attached as Bates
 11 Number 401902.

12 **REQUEST FOR PRODUCTION NO. 3:** Produce all documents and communications
 13 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 3.

14 **RESPONSE:**

15 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
 16 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
 17 seeks information that would not be relevant to the claims and defenses in this litigation.
 18 Interrogatory No. 3 is vague as to “maintenance of grievance kiosks systems.” Further objection,
 19 outside the scope of class certification question, and the request is disproportionate to the needs of
 20 this case. Objection to the extent that the discovery request seeks attorney-client and/or work
 21 product. Without waiving objections, and limiting answer to Jail location 3NA and the time period
 22 of April 8, 2020 to the date of the initial Complaint May 2, 2023: This discovery request may be
 23 supplemented.

24 **8/2/24 SUPPLEMENTAL RESPONSE:**

1 No Documents.

2 **REQUEST FOR PRODUCTION NO. 4:** Produce all documents and communications
3 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 4.

4 **RESPONSE:**

5 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
6 to discovery of admissible evidence. Interrogatory No. 4 is vague as to “complaint,” “sanitation
7 conditions,” “complaints about plumbing, toilets, sewage, and/or unsanitary conditions.” The
8 discovery request is duplicative and/or seeks duplicative materials as Requests for Production 15.
9 The request is disproportionate to the needs in this case and seeks information that would not be
10 relevant to the claims and defenses in this litigation. Further objection, outside the scope of class
11 certification question, and the request is disproportionate to the needs of this case. Without
12 waiving objections, the time period of April 8, 2020 to the date of the initial Complaint May 2,
13 2023: See document produced by Defendant Pierce County identified as follows:

- 14 • GRIEVANCE PROCEDURE
15 WOLFCLAN DEF PC 400949-400952

16 **REQUEST FOR PRODUCTION NO. 5:** Produce all documents and communications
17 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 5.

18 **RESPONSE:**

19 The discovery request implicates RCW 70.28.100 and privacy protection. Objection overly
20 broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible
21 evidence. The request is disproportionate to the needs in this case and seeks information that would
22 not be relevant to the claims and defenses in this litigation. Objection to the extent that the
23 discovery request seeks attorney-client and/or work product. Objection vague as to “complained
24 about unsanitary living conditions,” “complaints about plumbing, sewage, and/or toilets.” The

1 discovery request is duplicative and/or seeks duplicative materials as Requests for Production 15,
2 16, 18. Without waiving objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA
3 and the time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to
4 identify potential responsive information, the discovery request implicates ESI protocol.
5 Supplement pending ESI protocol finalization.

6 **REQUEST FOR PRODUCTION NO. 6:** Produce all documents and communications
7 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 6.

8 **RESPONSE:**

9 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
10 to discovery of admissible evidence. Interrogatory No. 6 is overly broad and vague as to "any"
11 capacity. The request is disproportionate to the needs in this case and seeks information that would
12 not be relevant to the claims and defenses in this litigation. Further objection, outside the scope
13 of class certification question. Objection to the extent that the discovery request seeks attorney-
14 client and/or work product. Without waiving objections, and limiting answer to name and title, Jail
15 location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2,
16 2023: No documents to produce.

17 **8/2/24 SUPPLEMENTAL RESPONSE:**

18 Objection - the discovery request raises concerns regarding security in the jail and safety
19 to staff and all other individuals in the jail. Without waiving objections and limiting answer to Jail
20 location 3NA: Pursuant to Protective Order: See Bates No. 401888-401891.

21 **SUPPLEMENTAL RESPONSE 08/09/2024:**

22 Objection regarding Protective Order withdrawn regarding Bates No. 401888-401891.

23 **SUPPLEMENTAL RESPONSE 08/22/2024: See documents produced by Defendant**
24 **Pierce County as follows:**

- 1 • **CORRECTIONAL SERGEANT CLASSIFICATION DESCRIPTION**
2 **WOLFCLAN DEF PC 402066-402069**
- 3 • **CORRECTIONS DEPUTY CLASSIFICATION DESCRIPTION**
4 **WOLFCLAN DEF PC 402070-402074**
- 5 • **PHYSICIAN/MEDICAL DIRECTOR CLASSIFICATION DESCRIPTION**
6 **WOLFCLAN DEF PC 402075-402078**
- 7 • **ADMINISTRATIVE ASSISTANT CLASSIFICATION DESCRIPTION**
8 **WOLFCLAN DEF PC 402079-402081**
- 9 • **MH EVALUATION SPECIALIST CLASSIFICATION DESCRIPTION**
10 **WOLFCLAN DEF PC 402082-402084**
- 11 • **MH MANAGER CLASSIFICATION DESCRIPTION**
12 **WOLFCLAN DEF PC 402085-402087**

13 **REQUEST FOR PRODUCTION NO. 7:** Produce all documents and communications
14 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 7.

15 RESPONSE:

16 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
17 to discovery of admissible evidence. Objection Interrogatory No. 7 is overly broad as to “any
18 portion of the plumbing” and vague as to “each instance,” “inspected, repaired, or replaced.” The
19 request is disproportionate to the needs in this case and seeks information that would not be
20 relevant to the claims and defenses in this litigation. Objection to the extent that the discovery
21 request seeks attorney-client and/or work product. Objection to the extent that this discovery
22 request is/would be duplicative to Interrogatory No. 9 and Request for Production No. 9. Without
23 waiving objections and limiting answer to Jail location 3NA and the time period of April 8, 2020,
24 to the date of the initial Complaint May 2, 2023: In order to identify potential responsive
information, the discovery request implicates ESI protocol. Supplement pending ESI protocol
finalization.

1 **REQUEST FOR PRODUCTION NO. 8:** Produce all documents and communications
2 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 8.

3 **RESPONSE:**

4 The discovery request implicates RCW 70.28.100 and privacy protection. Objection overly
5 broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible
6 evidence. The request is disproportionate to the needs in this case and seeks information that would
7 not be relevant to the claims and defenses in this litigation. Objection to the extent that the
8 discovery request seeks attorney-client and/or work product. Without waiving objections and
9 limiting answer to Plaintiff Wolfclan, see Plaintiff's Jail file produced with Initial Disclosures,
10 Bates stamp 400001-400400, 400425-400518, 400528-400532, and 400543-400546.
11 Additionally, see Plaintiff Wolfclan's Jail file from his most recent incarceration at the Pierce
12 County Jail identified as follows:

- 13 • WOLFCLAN DEF PC 400550-400923

14 **REQUEST FOR PRODUCTION NO. 9:** Produce all documents and communications
15 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 9.

16 **RESPONSE:**

17 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
18 to discovery of admissible evidence. Objection Interrogatory No. 9 is overly broad and vague as
19 to "studies and/or cost estimates," "plumbing and/or toilets." Objection to the extent that this
20 discovery request is/would be duplicative to Interrogatory No. 7 and Request for Production No.
21 7. The request is disproportionate to the needs in this case and seeks information that would not
22 be relevant to the claims and defenses in this litigation. Objection to the extent that the discovery
23 request seeks attorney-client and/or work product. Without waiving objections and limiting answer
24 to Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May

1 2, 2023: In order to identify potential responsive information, the discovery request implicates ESI
2 protocol. Supplement pending ESI protocol finalization.

3 **REQUEST FOR PRODUCTION NO. 10:** Produce all documents and communications
4 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 10.

5 **RESPONSE:**

6 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
7 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
8 seeks information that would not be relevant to the claims and defenses in this litigation. The
9 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production
10 27. Objection to the extent that the discovery request seeks attorney-client and/or work product.
11 Objection overly broad and vague as to “cleaning of cells.” Without waiving objections and
12 limiting answer to policy identification: See documents produced by Defendant Pierce County
13 identified as follows:

- 14 • JAIL CLEANING POLICIES
WOLFCLAN DEF PC 400519-400527
- 15 • FACILITY HOUSEKEEPING
WOLFCLAN DEF PC 400926-400929
- 16 • POST ORDERS FOR 3 NORTH CLUSTER
WOLFCLAN DEF PC 400971

17 **REQUEST FOR PRODUCTION NO. 11:** Produce all documents and communications
18 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 11.

19 **RESPONSE:**

20 Objection assumes facts not in evidence. Objection overly broad and beyond the scope of
21 Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible evidence. Objection to
22 Interrogatory No. 11 as vague regarding “unsanitary living conditions.” The discovery request
23

1 also implicates RCW 70.28.100 and privacy protection. Objection to the extent that Interrogatory
2 No. 11 seeks an admission. Further objection, outside the scope of class certification question,
3 and the request is disproportionate to the needs of this case. Objection to the extent that the
4 discovery request seeks attorney-client and/or work product. Without waiving objection, and
5 limiting answer to Plaintiff Wolfclan, Plaintiff Wolfclan was not denied the ability to submit a
6 grievance. Plaintiff has provided no evidence to support this allegation. Discovery and
7 investigation continue.

8 **REQUEST FOR PRODUCTION NO. 12:** Produce all documents and communications
9 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 12.

10 **RESPONSE:**

11 Objection to the extent that the discovery request seeks attorney-client and/or work product
12 information or materials. Without waiving objection, see report produced with Defendants' Initial
13 Disclosures at Bates #400412-400424.

14 **REQUEST FOR PRODUCTION NO. 13:** Produce all documents and communications
15 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 13.

16 **RESPONSE:**

17 Objection to the extent that the discovery request seeks attorney-client and/or work product
18 information or materials. Without waiving objection, see Defendants' Initial Disclosures.
19 Discovery and investigation continue.

20 **REQUEST FOR PRODUCTION NO. 14:** Produce all documents and communications
21 relied upon in preparing, or reviewed while preparing, your response to Interrogatory No. 14.

22 **RESPONSE:**

23 The discovery request implicates RCW 70.28.100 and privacy protection. Objection to the
24 extent that this discovery request is/would be duplicative to Interrogatory No. 8 and Request for

1 Production No. 8. Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not
 2 likely to lead to discovery of admissible evidence. The request is disproportionate to the needs in
 3 this case and seeks information that would not be relevant to the claims and defenses in this
 4 litigation. Objection to the extent that the discovery request seeks attorney-client and/or work
 5 product. Without waiving objections and limiting answer to Plaintiff Wolfclan, see Plaintiff's Jail
 6 file produced with Initial Disclosures, Bates stamp 400001-400400, 400425-400518, 400528-
 7 400532, and 400543-400546. Additionally, see Plaintiff Wolfclan's Jail file from his most recent
 8 incarceration at the Pierce County Jail identified as follows:

- 9 • WOLFCLAN DEF PC 400550-400923

10 **REQUEST FOR PRODUCTION NO. 15:** Produce all documents and communications
 11 between Defendants and any inmates or employees of Pierce County Jail related to issues of
 12 backflow of toilets, plumbing, sanitation, maintenance or inspection of the same, and/or
 13 complaints thereof, including submitted grievances or requests to file grievances, from 2012 to
 14 Present.

15 RESPONSE:

16 The discovery request implicates RCW 70.28.100 and privacy protection. Objection overly
 17 broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead to discovery of admissible
 18 evidence. The request is disproportionate to the needs in this case and seeks information that would
 19 not be relevant to the claims and defenses in this litigation. Objection to the extent that the
 20 discovery request seeks attorney-client and/or work product. Objection to the extent that the
 21 discovery request seeks an admission. Objection vague as to "jail related issues of backflow of
 22 toilets, plumbing, sanitation, maintenance or inspection." The discovery request is duplicative
 23 and/or seeks duplicative materials as Requests for Production 16, 21, 24, 27. Without waving
 24 objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA and the time period of

1 April 8, 2020 to the date of the initial Complaint May 2, 2023: In order to identify potential
2 responsive information, the discovery request implicates ESI protocol. Supplement pending ESI
3 protocol finalization. See also the following:

- 4 • GRIEVANCE PROCEDURE
WOLFCLAN DEF PC 400949-400952
- 5 • INMATE CORRESPONDENCE
WOLFCLAN DEF PC 400953-400960

7 SUPPLEMENTAL ANSWER 08/15/2024: To the extent that production to Request
8 for Production No. 5 is responsive, see Bates Number 401902.

9 **REQUEST FOR PRODUCTION NO. 16:** Produce all documents and communications
10 related to Grievance 554280, Grievance 530542, or any other grievance filed by Plaintiff or any
11 other inmate related to sewage, backflow of toilets, sanitation issues, and/or maintenance of the
12 same, from 2012 to Present.

13 **RESPONSE:**

14 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
15 to discovery of admissible evidence. Plaintiff's request is improper and seeks all documents and
16 communications produced and/or relating to prior legal matter *Davey v. Pierce Co. et al.*, Cause
17 No. 3:21-cv-05068. See *King Co. v. Merrill Lynch & Co.*, 2011 WL 3438491, at *3 (cloned
18 discovery). The discovery request implicates RCW 70.28.100 and privacy protection. Objection
19 vague as to "related to sewage, backflow of toilets, sanitation issues, and/or maintenance." The
20 discovery request is duplicative and/or seeks duplicative materials as Requests for Production 4,
21 15. The request is disproportionate to the needs in this case and seeks information that would not
22 be relevant to the claims and defenses in this litigation. Objection to the extent that the discovery
23 request seeks attorney-client and/or work product. Without waving objections and limiting answer
24 to Plaintiff Wolfclan, Jail location 3NA and the time period of April 8, 2020 to the date of the

1 initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery
2 request implicates ESI protocol. Supplement pending ESI protocol finalization. See also Plaintiff's
3 Jail file produced with Initial Disclosures, Bates stamp 400001-400400, 400425-400518, 400528-
4 400532, and 400543-400546. Additionally, see Plaintiff Wolfclan's Jail file from his most recent
5 incarceration at the Pierce County Jail identified as follows:

- 6 • WOLFCLAN DEF PC 400550-400923

7 **REQUEST FOR PRODUCTION NO. 17:** Produce documents (including but not limited
8 to shift schedules or time sheets) sufficient to show which correctional officers and/or other
9 officers or guards or other employees were assigned to work in the 3 North A Unit of Pierce County
10 Jail each day from 2012 to Present.

11 **RESPONSE:**

12 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
13 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
14 seeks information that would not be relevant to the claims and defenses in this litigation. Objection
15 vague as to "documents...sufficient to show...". Further objection, the discovery request is outside
16 the scope of class certification question. Objection to the extent that the discovery request seeks
17 information related to employment outside of Pierce County, including but not limited to
18 NaphCare workers, and such information would not be in the care, custody or control of the
19 Defendants. Without waving objections and limiting answer to Pierce County employees, Jail
20 location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2,
21 2023: This discovery request will be supplemented.

22 **SUPPLEMENTAL RESPONSE 08-22-2024:** See documents produced by
23 Defendants Pierce County as follows:

- 24 • 3N CD ASSIGNMENTS DAY SHIFT

1 **WOLFCLAN DEF PC 401903-401967**

- 2 • **3N CD ASSIGNMENTS GRAVE SHIFT**
3 **WOLFCLAN DEF PC 401968-402001**
4 • **3N CD ASSIGNMENTS SWING SHIFT**
5 **WOLFCLAN DEF PC 402002-402065**

6 **REQUEST FOR PRODUCTION NO. 18:** Produce all records related to Plaintiff,
7 including but not limited to, disciplinary, medical, grievances, commissary, and/or any other
records related to Plaintiff from any period in which he was detained at Pierce County Jail.

8 **RESPONSE:**

9 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
10 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
11 seeks information that would not be relevant to the claims and defenses in this litigation. The
12 discovery request is duplicative and/or seeks duplicative materials as Requests for Production 15,
13 26, 27, 30. Without waiving objections, see Defendants' Initial Disclosure, Plaintiff Jail file at
14 Bates stamp 400001-400400, 400425-400518, 400528-400532, and 400543-400546.
15 Additionally, see Plaintiff Wolfclan's Jail file from his most recent incarceration at the Pierce
16 County Jail identified as follows:

- 17 • WOLFCLAN DEF PC 400550-400923

18 See also, Request for Production No. 30 regarding Plaintiff Wolfclan phone calls.

19 **REQUEST FOR PRODUCTION NO. 19:** Produce a map or layout of Pierce County
20 Jail that shows all of the units, cells, and locations of each toilet.

21 **RESPONSE:**

22 Objection the discovery request raises concerns regarding security in the jail and safety to
23 staff and all other individuals in the jail. Without waiving objections and limiting answer to Jail
24 location 3NA: Please contact defense counsel to discuss response subject to protective order.

1 8/2/24 SUPPLEMENTAL RESPONSE:

2 Pursuant to Protective Order: See Bates No. 401900-401901

3 **REQUEST FOR PRODUCTION NO. 20:** Produce all documents and communications
4 related to the design, installation, maintenance, inspection, and/or replacement of any portion of
5 the plumbing at Pierce County Jail since 1985 to Present.

6 RESPONSE:

7 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
8 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
9 seeks information that would not be relevant to the claims and defenses in this litigation. Objection
10 to the extent that the discovery request implicates RCW 70.28.100 and privacy protection.
11 Objection vague as to “design, installation, maintenance, inspection, and/or replacement of any
12 portion of the plumbing.” The discovery request is duplicative and/or seeks duplicative materials
13 as Requests for Production 2, 15, 16, 24. Objection to the extent that the discovery request seeks
14 attorney-client and/or work product. Objection the discovery request raises concerns regarding
15 security in the jail and safety to staff and all other individuals in the jail. Without waiving
16 objections and limiting answer to Jail location 3NA and the time period of April 8, 2020, to the
17 date of the initial Complaint May 2, 2023: In order to identify potential responsive information,
18 the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.
19 Please contact defense counsel to discuss response subject to protective order.

20 8/2/24 SUPPLEMENTAL RESPONSE:

21 Pursuant to Protective Order: See Bates No. 401892-401899

22 **REQUEST FOR PRODUCTION NO. 21:** Produce all documents and communications
23 related to the backflow of toilets, sewage issues, sanitation issues, or the living or working
24 conditions created thereby, at Pierce County Jail since 2012 to Present.

1 RESPONSE:

2 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
 3 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
 4 seeks information that would not be relevant to the claims and defenses in this litigation. Objection
 5 to the extent that the discovery request implicates RCW 70.28.100 and privacy protection.
 6 Objection vague as to “backflow of toilets, sewage issues, sanitation issues, or the living or
 7 working conditions created thereby.” Further objection, outside the scope of Plaintiff’s claims and
 8 the scope of class certification question, including but not limited to “working conditions.” The
 9 request is also disproportionate to the needs of this case. Objection to the extent that the discovery
 10 request seeks attorney-client and/or work product. The discovery request is duplicative to and/or
 11 seeks duplicative materials as Requests for Production 15, 16, 24, 27. Without waiving objections,
 12 and limiting answer to Jail location 3NA and the time period of April 8, 2020, to the date of the
 13 initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery
 14 request implicates ESI protocol. Supplement pending ESI protocol finalization.

15 SUPPLEMENTAL ANSWER 08/15/2024: To the extent that production to Request
 16 for Production No. 5 is responsive, see Bates Number 401902

17 REQUEST FOR PRODUCTION NO. 22: Provide all documents and communications
 18 related to the two lawsuits filed in 2012 against Pierce County regarding toilet issues at Pierce
 19 County Jail (*Meyer-Clemons v. Karr*, No. C11-5603-RBL-JRC, 2012 WL 709596 (W.D. Wash.
 20 Feb. 3, 2012); *Steele v. Kerr*, No. C11-5793-BHS-JRC, 2012 WL 710096 (W.D. Wash. Jan. 31,
 21 2012)).

22 RESPONSE:

23 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
 24 to discovery of admissible evidence. Plaintiff’s request is improper and seeks all documents and

1 communications produced and/or relating to prior legal matters. See *King Co. v. Merrill Lynch &*
 2 *Co.*, 2011 WL 3438491, at *3 (cloned discovery). Objection to the extent that the discovery
 3 request implicates RCW 70.28.100 and privacy protection. Further objection, outside the scope of
 4 class certification question. Objection to the extent that the discovery request seeks attorney-client
 5 and/or work product. Without waiving objections: Both cases dismissed on Fed. R. Civ. P. 12(b)(6)
 6 and pleadings available through the Federal Public Access to Court Electronic Records (PACER)
 7 service.

8 **REQUEST FOR PRODUCTION NO. 23:** Provide all documents and communications
 9 related to the plumber “Jason” who was sent to Plaintiff’s cell to snake his toilet on or around
 10 December 18, 2020.

11 **RESPONSE:**

12 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
 13 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
 14 seeks information that would not be relevant to the claims and defenses in this litigation. The
 15 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production
 16 2, 7, 15, 20. Objection to the extent that the discovery request implicates RCW 70.28.100 and
 17 privacy protection. Further objection, outside the scope of class certification question. Objection
 18 vague as to “plumber ‘Jason’.” Objection to the extent that the discovery request seeks attorney-
 19 client and/or work product. Without waiving objections and limiting answer to Plaintiff Wolfclan,
 20 Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint May 2,
 21 2023: In order to identify potential responsive information, the discovery request implicates ESI
 22 protocol. Supplement pending ESI protocol finalization.

23 **REQUEST FOR PRODUCTION NO. 24:** Produce all documents and communications
 24 between Ms. or Mrs. Herbison, who upon information and belief was an Officer or Cluster Officer

1 in 2021, and any inmates or employees of Pierce County Jail related to sewage issues, toilet
2 backflow issues, sanitation issues, and maintenance regarding the same, from 2012 to Present.

3 RESPONSE:

4 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
5 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
6 seeks information that would not be relevant to the claims and defenses in this litigation. The
7 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production
8 15. Objection to the extent that the discovery request implicates RCW 70.28.100 and privacy
9 protection. Further objection, outside the scope of class certification question. Objection vague as
10 to “sewage issues, toilet backflow issues, sanitation issues, and maintenance regarding the same.”
11 Objection to the extent that the discovery request seeks attorney-client and/or work product.
12 Without waiving objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA and the
13 time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify
14 potential responsive information, the discovery request implicates ESI protocol. Supplement
15 pending ESI protocol finalization.

16 **REQUEST FOR PRODUCTION NO. 25:** Provide all documents and communications
17 related to Plaintiff's transfer to or from any unit and/or any cell within a unit in Pierce County Jail
18 between April 4, 2022, and Present.

19 RESPONSE:

20 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
21 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
22 seeks information that would not be relevant to the claims and defenses in this litigation. The
23 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production
24 18. Further objection, outside the scope of class certification question. Objection to the extent that

1 the discovery request seeks attorney-client and/or work product. Without waiving objections:
2 Plaintiff's Jail file produced with Initial Disclosures, Bates stamp 400001-400400, 400425-
3 400518, 400528-400532, and 400543-400546. Additionally, see Plaintiff Wolfclan's Jail file from
4 his most recent incarceration at the Pierce County Jail identified as follows:

- 5 • WOLFCLAN DEF PC 400550-400923

6 In order to identify potential responsive information, the discovery request implicates ESI
7 protocol. Supplement pending ESI protocol finalization.

8 **REQUEST FOR PRODUCTION NO. 26:** Provide all documents and communications
9 related to any discipline or disciplinary proceeding to which Plaintiff was subject at any point
10 during any incarceration in Pierce County Jail.

11 **RESPONSE:**

12 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
13 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
14 seeks information that would not be relevant to the claims and defenses in this litigation. The
15 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production
16 18, 27. Objection to the extent that the discovery request implicates RCW 70.28.100 and privacy
17 protection. Further objection, outside the scope of class certification question. Objection to the
18 extent that the discovery request seeks attorney-client and/or work product. Without waiving
19 objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA and the time period of
20 April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify potential
21 responsive information, the discovery request implicates ESI protocol. Supplement pending ESI
22 protocol finalization.

23 **REQUEST FOR PRODUCTION NO. 27:** Provide all documents and communications
24 related to any discipline or disciplinary proceeding to which any detainee or inmate was subject at

1 any point while detained or incarcerated at Pierce County Jail in any way related to cleaning
2 supplies (or lack thereof), plumbing issues, toilet backflow or other malfunction, or
3 complaints/grievances, whether formal or informal, made about any of the aforementioned topics.

4 **RESPONSE:**

5 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
6 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
7 seeks information that would not be relevant to the claims and defenses in this litigation. The
8 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production
9 4, 15, 18, 26. Objection to the extent that the discovery request implicates RCW 70.28.100 and
10 privacy protection. Objection to the extent that the discovery request seeks an admission. Further
11 objection, outside the scope of class certification question. Objection vague as to “cleaning
12 supplies (or lack thereof), plumbing issues, toilet backflow or other malfunction, or
13 complaints/grievances whether formal or informal...” Objection to the extent that the discovery
14 request seeks attorney-client and/or work product. Without waiving objections and limiting answer
15 to Plaintiff Wolfclan, Jail location 3NA and the time period of April 8, 2020, to the date of the
16 initial Complaint May 2, 2023: In order to identify potential responsive information, the discovery
17 request implicates ESI protocol. Supplement pending ESI protocol finalization.

18 **REQUEST FOR PRODUCTION NO. 28:** Provide any report, summary, or other
19 document regarding whether any aspect of the plumbing at Pierce County Jail (or portion thereof)
20 is compliant with any applicable regulation, code, ordinance, or other legal requirement.

21 **RESPONSE:**

22 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
23 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
24 seeks information that would not be relevant to the claims and defenses in this litigation. The

1 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production
 2 29. Objection vague as to “report, summary, or other document,” “complaint with any applicable
 3 regulation, code, ordinance, or other legal requirement.” Without waiving objections and limiting
 4 answer to Jail location 3NA and the time period of April 8, 2020, to the date of the initial Complaint
 5 May 2, 2023: In order to identify potential responsive information, the discovery request implicates
 6 ESI protocol. Supplement pending ESI protocol finalization.

7 **REQUEST FOR PRODUCTION NO. 29:** Provide all documents and communications
 8 related either to (1) any report, summary, or other document any report, summary, or other
 9 document regarding whether any aspect of the plumbing at Pierce County Jail (or portion thereof)
 10 is compliant with any applicable regulation, code, ordinance, or other legal requirement, or (2) the
 11 preparation or drafting of any such report, summary, or other document.

12 **RESPONSE:**

13 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
 14 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
 15 seeks information that would not be relevant to the claims and defenses in this litigation. The
 16 discovery request is duplicative to and/or seeks duplicative materials as Requests for Production
 17 28. Objection vague as to “related,” “report, summary, or other document any report, summary,
 18 or other document,” “any aspect of the plumbing,” “preparation or drafting...” Objection to the
 19 extent that the discovery request seeks attorney-client and/or work product. Without waiving
 20 objections and limiting answer to Jail location 3NA and the time period of April 8, 2020, to the
 21 date of the initial Complaint May 2, 2023: In order to identify potential responsive information,
 22 the discovery request implicates ESI protocol. Supplement pending ESI protocol finalization.

23 **REQUEST FOR PRODUCTION NO. 30:** Provide a copy of any transcript and/or audio
 24 recording of Plaintiff Wolfclan’s telephone calls from April 4, 2023, to August 15, 2023.

1 RESPONSE:

2 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
3 to discovery of admissible evidence. The request seeks information that would not be relevant to
4 the claims and defenses in this litigation. Further objection, outside the scope of class certification
5 question. Without waiving objections: Audio recordings attached.

6 **REQUEST FOR PRODUCTION NO. 31:** Provide a copy of all documents and
7 communications related to the inspection of Cell Block 3 North A on or around April 26, 2023.

8 RESPONSE:

9 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
10 to discovery of admissible evidence. The request is disproportionate to the needs in this case and
11 seeks information that would not be relevant to the claims and defenses in this litigation. Objection
12 to the extent that the discovery request implicates RCW 70.28.100 and privacy protection. The
13 discovery request is duplicative to and/or seeks duplicative materials as other discovery requests.
14 Objection to the extent that the discovery request seeks attorney-client and/or work product.
15 Without waiving objections and limiting answer to Plaintiff Wolfclan, Jail location 3NA and the
16 time period of April 8, 2020, to the date of the initial Complaint May 2, 2023: In order to identify
17 potential responsive information, the discovery request implicates ESI protocol. Supplement
18 pending ESI protocol finalization.

19 **REQUEST FOR PRODUCTION NO. 32:** Provide a copy of all documents and
20 communications referencing or related to the October 1, 2014, Main Jail Water Closet
21 Replacement Pre-Design report created by Hultz BHU Consulting Engineers, Inc.

22 RESPONSE:

23 Objection overly broad and beyond the scope of Fed. R. Civ. P. 26, and not likely to lead
24 to discovery of admissible evidence. The request seeks information that would not be relevant to

1 the claims and defenses in this litigation. Objection to the extent that the discovery request seeks
2 attorney-client and/or work product. Without waiving objections and limiting answer to the time
3 period of April 8, 2020, to the date of the initial Complaint May 2, 2023: No documents.

4 DATED this 22nd day of August, 2024.

5 MARY E. ROBNETT
6 Pierce County Prosecuting Attorney

7 s/ FRANK A. CORNELIUS
8 FRANK A. CORNELIUS, WSBA # 29590
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13
14
15 **CERTIFICATE OF SERVICE**

16 On August 22, 2024, I hereby certify that I electronically sent the foregoing PLAINTIFF
17 ECHOTA WOLCLAN'S FIRST INTERROGATORIES AND REQUESTS FOR PRODUCTION
18 TO DEFENDANTS AND FOURTH SUPPLEMENTAL ANSWERS THERETO RE:
INTERROGATORY NO. 2, REQUEST FOR PRODUCTION NO. 2, REQUEST FOR
PRODUCTION NO. 15, AND REQUEST FOR PRODUCTION NO. 21 to the following:

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